

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: STACEY N. STREET

CHAPTER 13

DEBTOR

CASE NO. 15-10904 JDW

OBJECTION TO SECURED CLAIM AND OTHER RELIEF

COME NOW, Debtor(s) by and through counsel, and files this objection to the following pre-petition secured claim and requests the Court to set the value for the purpose of plan confirmation:

CREDITOR: Green Tree
P.O. Box 6172
Rapid City, SD 57709-6172

Description of Collateral: 1999 28X40 Fleetwood Mobile Home

Amount of Debt: \$28,599.72, the amount alleged to be due.

Treatment: Pay Amount of \$12,500.00 the value of the property, plus interest of 5%, and upon payment of same eliminate any lien.

DEBTOR(S) pray(s) that upon payment of value plus interest, the lien be canceled and any title documents be delivered to Debtor(s).

DATED: March 26, 2015

Respectfully submitted,

/s/Karen B. Schneller
KAREN B. SCHNELLER, MSB 6558
ROBERT H. LOMENICK, JR., MSB 104186
NORTH MS BANKRUPTCY GROUP, PLLC
126 NORTH SPRING STREET
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HOLLY SPRINGS, MS 38635
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CHAPTER 13

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CASE NO. 15-10904 JDW

NOTICE OF OBJECTION TO SECURED CLAIM

YOU ARE HEREBY NOTIFIED that a written response to the attached objection to secured claim, etc., must be filed with:

Clerk of Court
U.S. Bankruptcy Court
Northern District of Mississippi
703 Highway 145 North
Aberdeen, MS 39730

and a copy must be served on the undersigned Debtor(s) attorney and the Chapter 13 trustee on or before thirty (30) days from the date of this notice, or the court may enter a Confirmation Order, which shall set the value of each affected secured creditor's lien, and which shall sustain the objection to secured claim, etc., granting the relief requested therein. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

DATED: March 26, 2015

CHAPTER 13 STANDING TRUSTEE

Locke D. Barkley
Chapter 13 Trustee
6360 I-55 North, Suite 140
Jackson, MS 39211

/s/Karen B. Schneller
KAREN B. SCHNELLER, MSB 6558
ROBERT H. LOMENICK, JR., MSB 104186
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126 North Spring Street
Post Office Box 417
Holly Springs, MS 38635
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CERTIFICATE OF SERVICE

I, Karen B. Schneller/Robert H. Lomenick, Jr., attorney for debtor(s), do hereby certify that I have this day mailed a true and correct copy by electronic means or United States Mail, postage prepaid, of the above and foregoing Objection to Secured Claim and Other Relief and Notice of Objection to Secured Claim to the creditor(s) named therein at their respective addresses.

DATED: March 26, 2015

/s/Karen B. Schneller
ATTORNEY FOR DEBTOR(S)